

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

:
: CHAPTER 13

ELTON M. KNIGHTON
TINA M. KNIGHTON
Debtor

: CASE NO. 11-52141 JPS

MOTION FOR MODIFICATION OF PLAN
PRIOR TO CONFIRMATION

The debtors, under the authority of the U.S. Bankruptcy Code, file this Motion for Modification of Plan Prior to Confirmation and respectfully shows:

1.

Debtors filed a Chapter 7 proceeding on July 11, 2011 and subsequently converted the case to a Chapter 13 on November 23, 2011.

2.

Debtor modifies to add that the Wells Fargo Student Loan payment will be paid directly by the Debtors' daughter outside the plan.

3.

Debtors further modify to increase the divided to unsecured creditors to \$12,28740.

4.

Schedules I and J are not amended.

WHEREFORE, debtor prays that their plan as modified be confirmed by the Court; and that they have such other and further relief as is just.

This 29th day of December, 2011.

/s/ Gail C. Robinson

GAIL C. ROBINSON
Attorney for Debtor
State Bar Number 610345

GAIL C. ROBINSON, LLC
Attorney at Law
P.O. Box 9925
Warner Robins, GA 31095-9925

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing Motion for Modification of Plan Prior to Confirmation and Notice of Hearing upon the following parties electronically:

Camille Hope, Trustee, P.O. Box 954, Macon, Georgia 31202

and the following parties on the Matrix attached hereto on Exhibit AA@, by placing copies of same in the U.S. Mail with sufficient postage affixed to insure delivery.

This 29th day of December, 2011.

/s/ Gail C. Robinson

Gail C. Robinson

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Debtors

: CASE NO. 11-52141 JPS

NOTICE OF TIME TO OBJECT

THE DEBTOR IN THE ABOVE-CAPTIONED CASE HAVING FILED A MOTION WITH THE COURT, SAID MOTION BEING ATTACHED HERETO.

IF YOU DO NOT WANT THE COURT TO ALLOW THE DEBTOR TO MODIFY THEIR CHAPTER 13 PLAN, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE DEBTORS' MOTION TO MODIFY PLAN PRIOR TO CONFIRMATION THEN YOU OR YOUR ATTORNEY MUST FILE WITH THE COURT A WRITTEN RESPONSE TO THE MODIFICATION ON OR BEFORE JANUARY 24, 2012. THE WRITTEN RESPONSE SHOULD BE SENT TO THE CLERK OF THE COURT, U.S. BANKRUPTCY COURT, MIDDLE DISTRICT OF GEORGIA, P.O. BOX 1957, MACON, GEORGIA 31202.

IF YOU MAIL YOUR RESPONSE TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE THE RESPONSE ON OR BEFORE THE RESPONSE DATE STATED ABOVE.

ANY RESPONSE MUST ALSO BE MAILED TO THE OBJECTING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE MODIFICATION.

A HEARING OF CONFIRMATION ON THE DEBTOR'S PLAN AS MODIFIED WILL BE HELD ON FEBRUARY 2, 2011 AT 1:30 P.M., AT THE UNITED STATES BANKRUPTCY COURT, COURTROOM A, 433 CHERRY STREET, MACON, GEORGIA.

This 29th day of December, 2011.

/s/ Gail C. Robinson

GAIL C. ROBINSON
Attorney for Debtor
State Bar No. 610345

GAIL C. ROBINSON, LLC
Attorney at Law
P.O. Box 9925
Warner Robins, GA 31095-9925
(478)929-9702

Creditors

Bibb Collection Service
P.O. Box 978 (9820636)
Macon, GA 31202 (cr)

Bleckley Memorial
145 East Peacock St (9820638)
Cochran, GA 31014-7846 (cr)

Bleckley Memorial
145 East Peacock Street (9820637)
Cochran, GA 31014 (cr)

Cenlar
P.O. Box 77404 (9820633)
Trenton, NJ 08628 (cr)

Credit Bureau Assoc of GA
P.O. Box 1226 (9820639)
Milledgeville, GA 31059-1226 (cr)

EagleMark
P.O. Box 22048 (9820634)
Carson City, NV 89721-2048 (cr)

GEMB/AEO
P.O. Box 530942 (9820640)
Atlanta, GA 30353-0942 (cr)

GEMB/Belk
P.O. Box 965028 (9820641)
Orlando, FL 32896-5028 (cr)

GEMB/Lowes
P.O. box 960010 (9820642)
Orlando, FL 32896-0010 (cr)

GEMB/Lowes
P.O. box 965005 (9820643)
Orlando, FL 32896-5005 (cr)

Harley-Davidson Credit Corp.
9441 LBJ Freeway, Suite 350 (9959646)
Dallas, Texas 75243 (cr)

HSBC Bank Nevada, N.A.
Bass & Associates, P.C. (9836153)
3936 E. Ft. Lowell Rd, Suite 200 (cr)
Tucson, AZ 85712

HSBC/Best Buy (9820644)

P.O. Box 5222 Carol Stream, IL 60197-5222	(cr)
Kay Jewelers P.O. Box 3680 Akron, OH 44309	(9820645) (cr)
Loan Servicing Center P.O. Box 650750 Dallas, TX 75265-0750	(9820646) (cr)
Radiology Associates of Macon P.O. Box 4808 Macon, GA 31213	(9820647) (cr)
Robins Federal Credit Union 803 Watson Blvd. Warner Robins, GA 31093	(9820635) (cr)
Rosenbaum Orthopaedics LLC P.O. Box 4207 Macon, GA 31208-4207	(9820648) (cr)
Taylor Regional Hospital 222 Perry Hwy Hawkinsville, GA 31036-6748	(9820649) (cr)
The Medical Center P.O. Box 116417 Atlanta, GA 30368-6417	(9820650) (cr)
Wells Fargo Education Financial Services 301 E. 58th St. N. Sioux Falls, SD 57104	(9959053) (cr)